

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

SUNG KOOK (BILL) HWANG and  
PATRICK HALLIGAN,

Defendants.

22 Cr. 240 (AKH)

**SUPPLEMENTAL DECLARATION OF  
JORDAN ESTES IN FURTHER SUPPORT  
OF DEFENDANT SUNG KOOK (BILL)  
HWANG'S MOTION TO EXCLUDE  
EVIDENCE AND COMPEL DISCOVERY  
ON THE PROSECUTION'S RULE 16  
VIOLATION**

I, Jordan Estes, an attorney duly admitted to practice before this Court, hereby declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, as follows:

1. I am a partner at the law firm of Kramer Levin Naftalis & Frankel LLP, counsel for Defendant Sung Kook (Bill) Hwang in the above-captioned matter.

2. I submit this Declaration to provide the Court with documents and information pertinent to Mr. Hwang's reply memorandum in further support of his motion to exclude evidence and compel discovery on the prosecution's Rule 16 violation.

3. On December 19, 2023, the prosecution provided a list of exhibits to the defense that did not include any reference to the Undisclosed Trade Data. The exhibit list included a category of exhibits called "Trade Data Sets" that included the previously produced Archegos Trade Data and trade data related to data from the New York Stock Exchange and NASDAQ.

4. On January 5, 2024, the prosecution produced to the defense as Jencks Act material 150 charts associated with Robert Battalio and Carmen Taveras, labeled 3505-7 to 3505-39, 3505-91 to 3505-92, 3505-94 to 3505-151, 3505-153 to 3505-174, 3571-07 (containing 18 charts), 3571-09 (containing 14 charts), 3571-10, 3571-15, and 3571-18. Based on

information in the prosecution's Jencks Act disclosures, those charts appear to be based on the Undisclosed Trade Data.

5. To the best of my knowledge, information, and belief, the exhibits to this Declaration are true and correct copies of the following documents.

6. Exhibit N is a copy of Jencks Act material associated with the prosecution's expert witness Robert Battalio, labeled 3505-198, which the prosecution produced to the defense on January 12, 2024.

7. Exhibit O is a copy of Jencks Act material associated with the prosecution's expert witness Carmen Taveras, labeled 3571-025, which the prosecution produced to the defense on January 12, 2024.

Dated: New York, New York  
January 15, 2024

/s/ Jordan Estes  
Jordan Estes